

**JOE HAND PROMOTIONS, INC.,**

**Plaintiff,**

**v.**

**TIMOTHY JOSEPH GALVIN, indiv. and d/b/a**  
**VIDEO WONDERS, INC. d/b/a COOL MUSIC**  
**STOP BAR & GRILL, and VIDEO WONDERS,**  
**INC. d/b/a COOL MUSIC STOP BAR &**  
**GRILL,**

**Defendants.**

Case No. 2011-cv-50123

**NOW COMES** the Plaintiff, JOE HAND PROMOTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an Order for Default against Defendant, VIDEO WONDERS, INC. d/b/a COOL MUSIC STOP BAR & GRILL, and to Strike Defendant, Timothy Joseph Galvin's Answer to Plaintiffs Complaint, and in support thereof, states as follows:

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deny the allegations asserted against it by the opposing party.

5. Additionally, as of the filing of this Motion, Defendant Video Wonders, Inc. has failed to file an answer or appearance in this matter.

6. Defendant, Timothy Anthony Galvin's Answer to Plaintiffs Complaint failed to comply with Illinois Rule 8(b) and therefore should be stricken.

**WHEREFORE**, the Plaintiff, JOE HAND PROMOTIONS, INC., respectfully prays this Honorable Court for the entry of an Order of Default against VIDEO WONDERS, INC. d/b/a COOL MUSIC STOP BAR & GRILL, and to Strike Defendant, Timothy Joseph Galvin's Answer to Plaintiffs Complaint, and for such other relief as this Court deems just and right.

//s/Andre Ordeanu  
Andre Ordeanu

Andre Ordeanu  
ZANE D. SMITH & ASSOCIATES, LTD.  
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#### **CERTIFICATE OF SERVICE**

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on August 22, 2011, using the CM/ECF system as well as sent to Defendant by Regular and Certified Mail to the address as listed on the Notice of Motion. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

//s/ Andre Ordeanu  
Andre Ordeanu

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